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EPA-ARHM/HWMS

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

NOV 3 1980

Region VII, Kansas City, Missouri 64108

George S. Graff, President
McDonnell Aircraft Company
McDonnell Douglas Corporation
Post Office Box 516
St. Louis, Missouri 63166

Re: Request of Information
McDonnell Aircraft Company
McDonnell Douglas Corporation
St. Louis, Missouri

Dear Mr. Graff.

The United States Environmental Protection Agency (U.S. EPA), Region V office, has become aware that wastes from the McDonnell Aircraft Company or McDonnell Douglas Corporation operations in St. Louis, Missouri, have been transmitted to A&F Materials, Incorporated (A&F) or to Genet Refining and Recovery Company (Genet) in Greenup or Olney, Illinois. Such wastes have been causing a hazardous situation. A series of discharges to navigable waters have occurred at these facilities. Hazardous wastes have been found in these discharges or on the premises, including significant levels of polychlorinated biphenyls (PCB's).

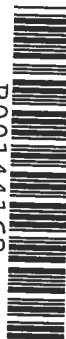
Region V of the U.S. EPA is gathering information to allow us to properly assess potential or actual health or environmental problems associated with waste handling and disposal practices at the A&F and Genet facilities. The information is requested pursuant to Section 308 of the Clean Water Act (33 U.S.C. § 1318), Sections 3007 and 8003 of the Resource Conservation and Recovery Act (42 U.S.C. 6927 and 6983), and Section 11 of the Toxic Substances Control Act (15 U.S.C. § 2610).

The focus of this inquiry is on the generation of wastes at your St. Louis, Missouri facilities which were subsequently transmitted to A&F or Genet. We realize you may not have formal records that cover the entire span of interest in this request. Nevertheless, every reasonable effort should be made to reconstruct the waste handling practices for which records do not exist. This effort should include interviews with employees as needed.

The information requested herein must be provided to this office notwithstanding its possible characterization as confidential information or trade secrets. However, should you so request, any information which the Administrator of this Agency determines to constitute methods, processes, or other business information entitled to protection as trade secrets will be maintained as confidential pursuant to the procedures specified in 40 CFR, Part 2. Any request for confidentiality must be made when the information is submitted, since any information not so identified cannot be accorded this protection by the Agency.

RCRA RECORDS CENTER

R00144162



The written statements submitted pursuant to this request must be notarized and submitted under an authorized signature certifying that all statements contained therein are true and accurate to the best of the signatory's knowledge and belief. Moreover, any documents submitted to Region V pursuant to this information request should be certified as true and authentic to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submittal of the requested information, that any portion of the submitted information is false, the signatory should so notify Region V. If any answer certified as true should be found to be untrue, the signatory can and may be prosecuted pursuant to 18 U.S.C. § 1001.

If you have any questions regarding this matter, please contact Mr. Norm Niedergang, an engineer on my staff, at (312) 353-2110 or Mr. Lawrence Kyte, an attorney on my staff, at (312) 353-2094. Your response should be sent to the Enforcement Division, Attention: Water and Hazardous Materials Compliance Section.

Very truly yours,

Original Signed by Sandra S. Gardebring

Sandra S. Gardebring
Director, Enforcement Division

Enclosure

bcc: Michael Mauzy, Director
Illinois Environmental Protection Agency

Robert L. Simpkins
Assistant United States Attorney

Robert van Huevelen, Attorney
Department of Justice

Frederick Stiehl, Attorney (EN-335)
Hazardous Waste Enforcement Task Force

Charles McLaughlin
United States Environmental Protection Agency
Region VII

Richard Fehler
Missouri Department of Natural Resources

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF:

MCDONNELL AIRCRAFT COMPANY
MCDONNELL DOUGLAS CORPORATION

ST. LOUIS, MISSOURI

)
) Information Request Pursuant to
) Section 308 Clean Water Act
) (33 U.S.C. § 1318) Sections 3007
) and 8003, Resource Conservation
) and Recovery Act (42 U.S.C. 6927
) and 6983) Section 11, Toxic
) Substances Control Act
) (15 U.S.C. 2610 (c))

This is a request for information pursuant to the above cited authority pertaining to the McDonnell Douglas Corporation, McDonnell Aircraft Company (McDonnell) St. Louis, Missouri facilities and associated activities as they relate to A&F Materials Company (A&F) and Genet Refining and Recovery (Genet) of Greenup, Illinois. A&F (a Nevada corporation) has operated waste recovery and recycling facilities on West Cumberland Street in Greenup, Illinois, and near Olney, Illinois. Genet is a successor in interest to a portion of the A&F facilities in Greenup. Genet is a wholly owned subsidiary or assumed name for R.C.D. Chemicals Incorporated (R.C.D.) of St. Louis, Missouri.

The information requested below is to be provided within 30 days of this request by a responsible corporate official(s).

Definitions:

1. "Person" shall include any natural person, corporation, partnership, association, company, assumed name or other legal entity.
2. "McDonnell" includes any corporate officer, director, employee, agent, contractor or subcontractor.
3. "Waste" includes, but is not necessarily limited to, any solid waste, incinerator residue, sludge, chemical or biological waste, or industrial waste.

REQUEST FOR INFORMATION

The request for information contained in this document pertains to the McDonnell Douglas Corporation, McDonnell Aircraft Company, St. Louis, Missouri. This request pertains to any and all information you may have regarding your association with A&F, Greenup or Olney, Illinois, or with Genet, Greenup, Illinois.

Within 30 days following receipt of this request, McDonnell shall provide for the above-named facilities the information described below. The relevant time period for this request shall be from January 1975 to the present.

1. A description of all solid or liquid wastes, oils, sludges, caustics, acids or other materials transmitted to A&F or Genet. This description shall include the following:

- a. Dates of transmission.
- b. Volumes of material per transmission.
- c. Facility to which material was transmitted.
- d. General description of the types of material transmitted.
- e. Results of all sampling or chemical analysis performed by you, or by any sub-contractor, agent, agency, employee, transporter or disposer and communicated to you, concerning materials transmitted to A&F or Genet.
- f. Source of material transmitted.

2. A listing of transporters used to transmit materials to A&F or Genet.

3. Copies of all records, contracts, invoices, manifests, bills of lading, ledgers, account books or other documents evidencing agreements or arrangements with A&F or Genet regarding acceptance of materials, transmitted from your facilities to A&F or Genet.

4. A description of any site investigation or inspection of A&F or Genet by McDonnell or by any sub-contractor, agent, agency, employer, transporter or disposer and communicated to McDonnell concerning the method of operation at the facility.

5. A description of any incidences of spills or contamination at A&F or Genet, communicated to McDonnell.

6. Have the St. Louis, Missouri facilities included the use of, or resulted in the generation of waste or materials containing polychlorinated biphenyls (PCBs) during the relevant time period for this request?

If so:

- a. Describe such uses and produced wastes or materials.


- b. Describe how such waste are stored, treated or disposed of.
- c. Describe what analysis procedures are used prior to disposal of such waste.
- d. Describe any PCB contaminated material or waste which was shipped to A&F, R.C.D. or Genet, including quantities and concentrations. (This information may be provided in item 1.)

The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. Should you so request, however, any information (other than public information) which the Administrator of this Agency determines to constitute methods, processes or other business information entitled to protection as trade secrets will be maintained as confidential or a trade secret. A request for confidential treatment must be made when the information is provided, since any information not so identified will not be accorded this protection by the Agency.

The written statement submitted pursuant to this request must be notarized and returned under an authorized signature certifying that all statements contained therein are true and accurate to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submittal of the requested information, that any portion of this submission certified as true is false or incorrect, the signatory shall so notify Region V. If any answer certified as true is found to be untrue, the signatory can be prosecuted under 18 U.S.C. 1001.

Please submit your response within the designated time period to the Director, Enforcement Division, United States Environmental Protection Agency, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, Attention: Water and Hazardous Materials Compliance Section.

Signed this 28th day of October, 1980.


Sandra S. Gardebring
Director, Enforcement Division
U.S. Environmental Protection Agency
Region V